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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ERIN KUHN-BROWN,

Plaintiff,

v.

DWIGHT NEVEN, et al.,

Defendants.

Case No. 2:19-cv-01140-RFB-MDC

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S
RESPONSE/OPPosition TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT
(THIRD REQUEST)**

Plaintiff, ERIN KUHN-BROWN, by and through her attorney of record, Lawrence J. Semenza, Esq., of the law firm of Lawrence J. Semenza, Ltd., and Defendants, by and through their Attorney of Record, Aaron D. Ford, Nevada Attorney General, and Leo T. Hedges, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby file Third Stipulation to Extend Plaintiff's time to respond/oppose Defendants' Motion for Summary Judgment due to be filed September, 8, 2025.

I. SUMMARY JUDGMENT MOTION

Defendants' Motion for Summary Judgment was filed and served on July 7, 2025, and included some 19 Exhibits, consisting of Declarations in support of the Motion and Exhibits consisting of Plaintiff's grievances filed at Florence McClure Women's Correctional Institution.

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1 Counsel for Plaintiff has been working with his client who was hospitalized for 12 days
2 to prepare the response/opposition and locate witnesses to assist in responding to Defendants'
3 Motion but will not be able to meet the extended deadline of September, 8, 2025.

4 Counsel for the respective parties have agreed to extend Plaintiff's response/opposition to
5 and including Monday, October 6, 2025.

6 DATED this 5th day of September, 2025.
7

8 LAWRENCE J. SEMENZA, LTD.

9 /s/ Lawrence J. Semenza

10 Lawrence J. Semenza, Esq., Bar No. 789
11 3753 Howard Hughes Parkway, Suite 200
12 Las Vegas, Nevada 89169

13 Attorneys for Plaintiff Erin Kuhn-Brown

6 DATED this 5th day of September, 2025

7 AARON D. FORD
8 ATTORNEY GENERAL

9 /s/ Leo T. Hedges

10 Leo T. Hedges, Bar No. 16034 Senior
11 Deputy Attorney General
12 1 State of Nevada Way Suite 100
13 Las Vegas, NV 89119

14 Attorney for Defendants

15 **ORDER**

16 **IT IS HEREBY ORDERED:**

17 Plaintiff's response/opposition to Defendants' Motion for Summary Judgment is extended
18 from September 8, 2025, until and including Monday, October 6, 2025.

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20 **Dated:** September 8, 2025.



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22 **RICHARD F. BOULWARE, II**
23 **UNITED STATES DISTRICT JUDGE**

24 Submitted by:
25 LAWRENCE J. SEMENZA, LTD.

26 /s/ Lawrence J. Semenza

27 LAWRENCE J. SEMENZA, ESQ.
28 3753 Howard Hughes Parkway Suite 200
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Attorneys for Plaintiff Erin Kuhn-Brown